1.0 INTRODUCTION

The Chollas Creek Dissolved Metals Total Maximum Daily Load (TMDL) Implementation Plan (Implementation Plan) defines the approach to planning, implementing, and assessing the effectiveness of best management practices (BMPs) with the goal to attain the wasteload allocations (WLAs) for dissolved metals and restore the beneficial uses of the Chollas Creek Watershed. A watershed approach was the basis for the implementation strategy presented in this plan. Planning and implementing integrated phases of projects which consider multiple water quality issues has multiple benefits. The approach meets the requirements of the adopted *Total Maximum Daily Loads for Dissolved Copper, Lead and Zinc in Chollas Creek, Tributary to San Diego Bay* (Dissolved Metals TMDL). The approach is also expected to minimize the adverse environmental effects in the Chollas Creek Watershed and have a long-term, cost-savings benefit by reducing the need to retrofit existing BMPs (hereafter referred often as watershed activities) to address future TMDLs. By integrating the Chollas Creek Dissolved Metals TMDL Implementation Plan with watershed and jurisdictional programs, the agencies involved (hereafter referred to as Dischargers) will be able to more effectively achieve long-term water quality goals.

This Implementation Plan was prepared in response to Resolution No. R9-2007-0043 wherein the San Diego Regional Water Quality Control Board (Regional Board) incorporated the Dissolved Metals TMDL into the *Water Quality Control Plan for the San Diego Region* (Basin Plan). The State Board Office of Administrative Law (OAL) reviewed and approved the Dissolved Metals TMDL on October 22, 2008. Although the TMDL focused on achieving the stated WLAs for dissolved copper, lead, and zinc in the receiving waters of the Chollas Creek Watershed, the TMDL Compliance Schedule was extended by 10 years to allow for the implementation of integrated watershed activities. Under this extended timeline, integrated watershed activities address "...bacteria, diazinon, and trash loading which also contribute to water quality problems in the watershed," (Section 8.3, Appendix I, Dissolved Metals TMDL, 2007). Although additional efforts may be necessary to address the pending *Project I – Beaches and Creeks in the San Diego Region TMDL for Indicator Bacteria* (Indicator Bacteria TMDL) the integrated, multi-pollutant approach presented in this Implementation Plan is consistent with the Dissolved Metals TMDL and watershed approach.

In developing a program to meet the Chollas Creek Dissolved Metals TMDL, this Implementation Plan takes a holistic approach to planning, implementation, and assessment of targeted watershed activities. This Implementation Plan fully integrates with existing watershed, regional, and jurisdictional programs (as well as agency-wide for State and Federal Dischargers) under existing National Pollutant Discharge Elimination System (NPDES) permit requirements.

This Implementation Plan presents an iterative, four-component, adaptive management strategy referred to in this document as the Integrated TMDL Watershed Approach. The four components of this approach form an iterative process of 1) Initial Assessment, 2) Planning, 3) Implementation, and 4) Effectiveness Assessment/Re-Evaluation as shown on Figure 1-1 below.

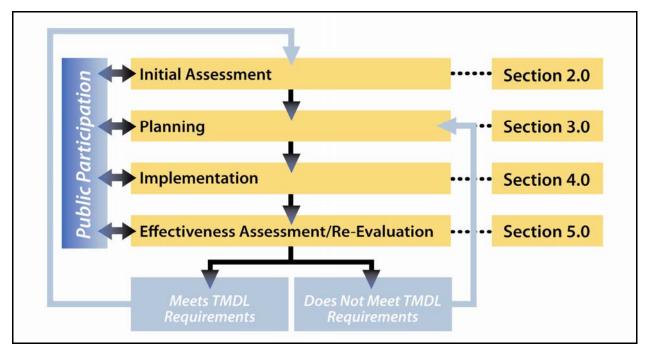


Figure 1-1. Integrated TMDL Watershed Approach to Meeting the Dissolved Metals TMDLs in the Chollas Creek Watershed

This Implementation Plan was structured using the four components of the Integrated TMDL Watershed Approach, as described below:

- **Section 2.0 Initial Assessment**—This section presents the key outcomes and key water quality findings from the initial assessment of water quality and pollutant source data for the Chollas Creek Watershed. A compilation of water quality data and reports used to develop these outcomes and findings is presented in Appendix A.
- Section 3.0 Planning—This section presents the key aspects of the watershed activity selection process used by Dischargers to develop a List of Watershed Activities for Phase I Implementation (Watershed Activities List), Phase I was defined as the first five years of the 20-year TMDL Compliance Schedule. These key aspects include goal setting, the opportunities and constraints of different watershed activities, and the public participation process. Discharger's individual Watershed Activities Lists are included in Appendix B.
- **Section 4.0 Implementation**—This section presents the framework which will be used by Dischargers for watershed activity implementation. Examples of watershed activities to be implemented by Dischargers are provided.
- Section 5.0 Effectiveness Assessment/Re-Evaluation—This section presents compliance and watershed activity assessment monitoring programs, data gaps identified during the Initial Assessment (and the associated Special Studies), and how they integrate into the overall iterative Integrated TMDL Watershed Approach. The *Chollas Creek TMDL Implementation Monitoring Program* is presented in Appendix C.

Each section of this Implementation Plan has related planning tools (Tools A–F) which were used by Dischargers to develop and prioritize their Watershed Activities Lists. The tools will be used during the planning and implementation of future program phases. The Integrated TMDL Watershed Approach and the planning tools are included in Appendix D.

1.1 Plan Participants and Stakeholders

The Dischargers named in the Dissolved Metals TMDL include: the City of San Diego, City of Lemon Grove, City of La Mesa, County of San Diego, San Diego Unified Port District (Port), the California Department of Transportation (Caltrans), and the United States Navy (Navy). The jurisdictional boundaries of the seven Dischargers within the Chollas Creek Watershed are shown on Figure 1-2.

The Dischargers began coordinating and preparing this Implementation Plan in July 2008. A Memorandum of Understanding (MOU) was drafted and executed. The MOU provides a mechanism for Discharger cost-sharing, partnering on special studies (Appendix B), coordinating monitoring efforts (Appendix C), and sharing watershed activity assessment data. The MOU emphasizes Discharger commitment to interagency communication and an open public advisory process with a focus on stakeholder input. Stakeholder input was sought during two Stakeholder meetings, one Stakeholder workshop regarding watershed activities, and three comment periods between September 2008 and May 2009 (Figure 1-3). Stakeholders who were invited to participate in this public advisory process include (listed alphabetically):

- Chollas CREAC.
- Ground Work San Diego Chollas Creek
- Sierra Club
- Friends of 32nd Street Canyon
- Friends of Famosa Slough
- City of San Diego Open Space Canyons Advisory Committee (OSCAC)
- San Diego Canyon Lands
- San Diego Coastkeeper
- Southern California Wetlands Recovery Project

Information regarding the stakeholder participation process is included in Appendix E.

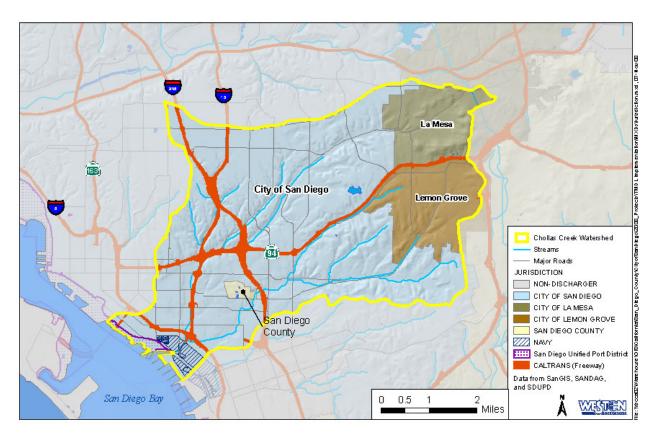


Figure 1-2. Map of the Chollas Creek Watershed and Dischargers

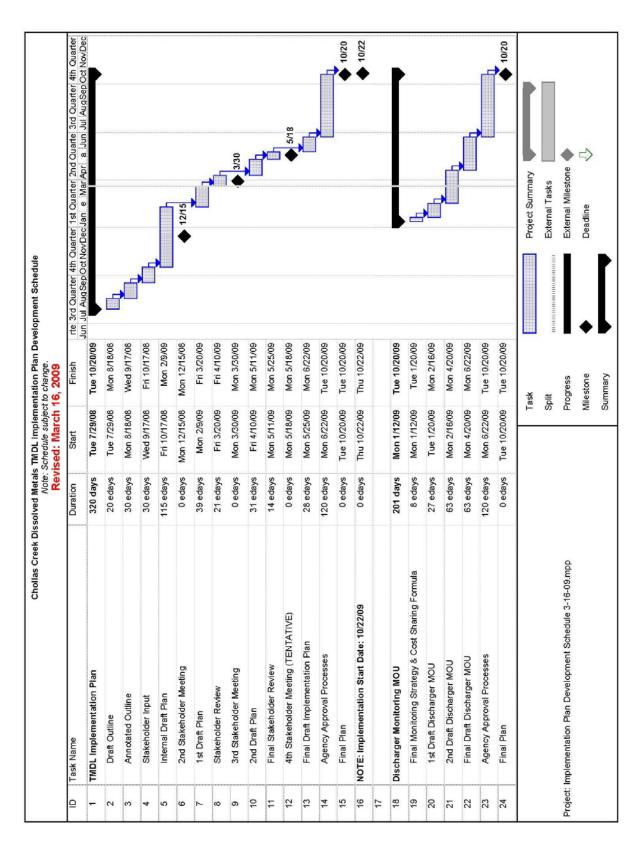


Figure 1-3. Watershed-Level Chollas Creek Implementation Schedule